



201-15688

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 27 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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James P. Mieure, Ph.D.
Manager, Product Stewardship
Solutia, Inc.
575 Maryville Centre Drive
St. Louis, MO 63141

Dear Dr. Mieure:

Thank you for your letter dated August 2, 2000, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letter states that while Solutia originally volunteered to sponsor Dihexylamine, 6,6'-diamino (CAS No. 143-23-7), Solutia does not manufacture that chemical and since Dihexylamine, 6,6'-diamino (CAS No. 143-23-7) is a major component of Hexanedinitrile, hydrogenated, high boiling fraction (CAS No. 68411-90-5), Solutia offered to sponsor Hexanedinitrile, hydrogenated, high boiling fraction (CAS No. 68411-90-5) instead. You mention that Dihexylamine, 6,6'-diamino (CAS No. 143-23-7) remains on the Chemical List and request that it be removed from the list to avoid confusion in the future. As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its ChemRTK website at www.epa.gov/chemrtk in March, 1999. Based on EPA's review of all the pertinent Inventory Update Rule (IUR) data from 1998 and 2002, EPA has determined that Dihexylamine, 6,6'-diamino (CAS No. 143-23-7) **does meet** the "no longer HPV" criteria. The HPV Challenge Program Chemical List will be annotated by designating this chemical with a "5" to indicate that they are "no longer HPV." In addition, EPA records show that Hexanedinitrile, hydrogenated, high boiling fraction (CAS No. 68411-90-5) is jointly sponsored by Solutia and DuPont. The test plan, submitted in February, 2003, for CAS No. 68411-90-5 shows that purified BMT, CAS No. 143-23-7 is included in that test plan as well.

Your letter also states that Solutia will sponsor 1,6-Hexanediaminium, N,N,N',N'-tetrabutyl-, N, N'-diethyl-, dihydroxide (CAS No. 111960-92-0). EPA's records reflect this commitment by Solutia, but also reflect that the test plan has not been received and is overdue.

Your letter states that you will now be participating with ICCA in the sponsorship of Adipic acid, compound with 1,6-hexanediamine (1:1) (CAS No. 3323-53-3). EPA's HPV Program Chemical List has been changed to reflect that this chemical is now being sponsored under the OECD HPV SIDS Initiative.

Your letter states that for three chemicals: L-aspartic acid (CAS No. 56-84-8), Fumaric acid, diammonium salt (CAS No. 14548-85-7), and L-aspartic acid, monoammonium salt (CAS No. 130296-88-7), the IUR reporting has been corrected to remove amounts produced for FDA-regulated uses and that, consequently, these chemicals should be removed from the HPV Chemicals List since TSCA controlled manufacture does not exceed 1 million pounds per year. After reviewing all the pertinent IUR data from 1998 and 2002, and using the criteria mentioned earlier in this letter, EPA has determined that L-aspartic acid (CAS No. 56-84-8), Fumaric acid, diammonium salt (CAS No. 14548-85-7), and L-aspartic acid, monoammonium salt (CAS No. 130296-88-7) **do meet** the "no longer HPV criteria." The HPV Challenge Program Chemical List will be annotated by designating these chemicals with a "5" to indicate that they are "no longer HPV."

Finally, your letter states that one package of data will be submitted on the mixture of the following five structurally similar chemicals as a category under the HPV program. Those chemicals are: m-terphenyl (CAS No. 92-06-8), p-terphenyl (CAS No. 92-94-4), Quaterphenyl (CAS No. 29036-02-0), Polyphenyls, Biphenyl and Terphenyl free (CAS No. 68514-80-7), and Terphenyl (CAS No. 26140-63-3). Please be advised that the CAS No. is actually 26140-60-3. The letter requests that Agency records be adjusted to reflect that all of the CAS numbers listed above will be included in a single category, and that Solutia is shown as sponsoring Quaterphenyl (CAS No. 29036-02-0) in 2003.

EPA provided comments on your test plan for this proposed category of chemicals on January 14, 2004. Agency records reflect that Solutia is sponsoring Quaterphenyl (CAS No. 29036-02-0) and Terphenyl (CAS No. 26140-60-3). Both chemicals are still being reported at production levels that meet the HPV criteria. EPA records also reflect that M-terphenyl (CAS No. 92-06-8) and P-terphenyl (CAS No. 92-94-4), which are mentioned as surrogates in your test plan, **do meet** the "no longer HPV criteria." The HPV Challenge Program Chemical List will be annotated by designating these chemicals with a "5" to indicate that they are "no longer HPV." Polyphenyls, Biphenyl and Terphenyl free (CAS No. 68514-80-7) is still being reported at production levels that meet the HPV criteria but it is currently shown as unsponsored. EPA will annotate its records to reflect that Solutia is sponsoring that chemical, based on your letter.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsca-hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201